



November 6, 2015

Reference No. 038443-12

Ms. Jenny Davison
Interim Remedial Project Manager
United States Environmental Protection Agency
Region V
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Mr. Steve Renninger
On-Scene Coordinator
U.S. EPA Region V
Emergency Response Branch
26 West Martin Luther King Drive
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Dear Ms. Davison and Mr. Renninger:

**Re: Progress Report: October 1 through 31, 2015
South Dayton Dump and Landfill Site, Moraine, Ohio (Site)**

This Monthly Progress Report is submitted in accordance with the Administrative Settlement and Order on Consent (ASAOC) for Remedial Investigation/Feasibility Study (RI/FS) Proceeding Under Sections 104, 107, and 122 of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), as amended, 42 U.S.C. §§ 9604, 9607, and 9622 (United States Environmental Protection Agency [USEPA]) Docket No. V-W-06-C-852) effective August 15, 2006 (RI/FS ASAOC), and the ASAOC for Removal Action Proceeding Under Sections 104, 106(a), 107, and 122 of the CERCLA, 42 U.S.C. §§ 9604, 9606(a), 9607, and 9622 USEPA Docket No. V-W-13-C-010, effective April 8, 2013 (Removal Action ASAOC), for the period of October 1 through 31, 2015.

The next Progress Report for the month of November 2015 will be submitted on or before December 10, 2015.

Significant Developments in this Reporting Period

RI/FS ASAOC Developments

There were no RI/FS ASAOC Developments in October 2015.

Removal Action ASAOC Developments

On September 29, 2015, GHD completed quarterly sub-slab depressurization system (SSDS) checks at all eight buildings. Two fans in B&G Trucking Building 8 were not operational; all other fans and SSDS components were operational.

On October 2, 2015, GHD provided USEPA with the Vapor Intrusion (VI) Mitigation Work Plan revised to reflect the sub-slab screening levels (attenuation factor of 50) discussed during the meeting held on September 10, 2015.

On October 2, 2015, GHD notified USEPA that sampling for B&G Trucking Building 8 was rescheduled to October 8, 2015. On the originally scheduled sample date of September 29, 2015, the fans at extraction points 1 and 2 (EP-1 and EP-2) were not operational. The fans were replaced on October 1, 2015.

On October 15, 2015, USEPA, Ohio EPA, Respondents, and Tetra-Tech participated in a conference call to discuss the status of the B&G Trucking Building 8 sample event.

On October 30, 2015, GHD provided USEPA with VI-related documents for review, including the VI Mitigation Work Plan, and draft sample result letters.

As of October 31, 2015, the status of each building requiring mitigation was as follows:

Building 8 (B&G Trucking):

- 30-day proficiency sampling completed on September 12, 2013, with additional confirmatory sampling completed on January 9, 2014 and March 10, 2014.
- Two rounds of 2015 indoor air (IA) and sub-slab (SS) soil vapor sampling completed on February 17, 2015 and July 15, 2015:
 - Trichloroethene (TCE) concentration in SS soil vapor sample collected from probe SS-8-A were greater than Ohio Department of Health (ODH) screening level (AF of 50). GHD suspects a localized TCE source under the building may be contributing to elevated TCE concentrations in the SS soil vapor.
 - Benzene concentrations from IA locations IA-8-A and IA-8-D were less than ODH screening levels. Benzene concentration from IA location IA-8-F was greater than the ODH screening level in the July 2015 sampling round. Available evidence suggests IA benzene concentrations are the result of ongoing daily human activities within and around Building 8 as well as IA background sources, and are not the result of a complete VI pathway.
 - The fan at extraction point EP-3 was not operating during the majority of the July 2015 sampling round and was replaced late in the day on July 15, 2015.
 - The fans at extraction points EP-1 and EP-2 were not operating on September 29, 2015 and were replaced on October 1, 2015.
- Respondents completed Building 8 sampling on October 6, 2015. All fans were operational on the sample date.
- Respondents and USEPA will propose SSDS modifications to the building owner.

Building 9 (B&G Trucking):

- 30-day and 180-day proficiency sampling completed on October 24, 2013 and March 10, 2014, respectively, with additional 180-day confirmatory sampling completed on May 20, 2014.

- Two rounds of 2015 IA and SS soil vapor sampling completed on February 17, 2015, and July 15, 2015:
 - TCE concentrations in samples collected from SS soil vapor probe SS-9-A remain greater than ODH screening levels. GHD suspects a localized TCE source under the building may be contributing to elevated TCE concentrations in SS soil vapor.
 - Benzene and xylenes were not detected in Building 9 during the July 2015 sampling round.
- Respondents and USEPA will propose SSDS modifications to the building owner.

Building 12 (Overstreet Painting and S&J Precision):

- 30-day proficiency sampling completed on October 24, 2013. A corrective action was implemented on March 6, 2014 and additional confirmatory sampling was completed on April 2 and 3, 2014.
- Two rounds of 2015 IA and SS soil vapor sampling completed on February 18, 2015 and July 13, 2015:
 - TCE concentrations in SS soil vapor samples remain greater than ODH screening and action levels. GHD suspects a localized TCE source under the building may be contributing to elevated TCE concentrations in SS soil vapor.
 - cis-1,2-Dichloroethene (cis-1,2-DCE) concentrations in SS soil vapor samples have decreased to less than the ODH screening level.
 - Benzene remains present in IA samples at concentrations greater than ODH screening levels; however, based on available data, the benzene concentrations in indoor air are a result of ongoing daily human activities within and around Building 12, and are not the result of a complete VI pathway.
- Respondents and USEPA will propose SSDS modifications to the building owner.

Building 14 (Bullseye Amusements):

- 30-day proficiency sampling completed on January 16, 2014 and 180-day proficiency sampling completed on June 3, 2014.
- Two rounds of 2015 IA and SS soil vapor sampling completed on February 19, 2015 and July 16, 2015.
- The building is in compliance; IA and SS concentrations are less than ODH screening levels.
- Annual proficiency sampling will be completed in July 2016.

Building 15 (SIM Trainer):

- 30-day proficiency sampling completed on February 13, 2014. A corrective action was implemented on April 6, 2014 and additional confirmatory sampling was completed on April 24, 2014.
- Two rounds of 2015 IA and SS soil vapor sampling completed on February 18, 2015 and July 14, 2015.

- The building is in compliance¹; IA and SS concentrations are less than ODH IA and SS (AF of 50) screening levels.
- Annual proficiency sampling will be completed in July 2016.

Building 17 (Megacity Construction):

- 30-day and 180-day proficiency sampling completed on January 16, 2014, and June 3, 2014, respectively.
- 1-year proficiency sampling completed on February 19, 2015.
- The building is in compliance.
- Annual proficiency sampling will be completed in February 2016.

Building 24 (Globe Equipment):

- 30-day, 180-day, and 1-year proficiency sampling completed on September 11, 2013, February 7, 2014, and December 5, 2014 respectively.
- One-year confirmatory sampling completed on February 20, 2015.
- Additional confirmatory sampling completed on July 16, 2015.
- The building is in compliance; IA and SS concentrations are less than ODH screening levels.
- Annual proficiency sampling will be completed in February 2016.

Summaries of all Anticipated Problems and Planned Resolutions

As previously discussed with USEPA, a number of the owners and tenants in buildings planned for vapor mitigation have expressed concerns regarding the intrusion that the VI sampling and mitigation has had, and will have, on their business. The owners of the buildings (i.e., South Dayton Remediation Trust) refused to allow additional work to occur. On October 24, 2014, the Respondents transmitted letters to the owners and tenants of the buildings with remaining sub-slab issues providing the analytical results for sampling completed to date and seeking their consent to cease intrusive vapor abatement activities and transition to an enhanced indoor air monitoring program. In January 2015, the legal counsel for the owners provided written notification that the owners and tenants agree to allow indoor air monitoring to proceed but were not willing to allow further remedial work. In September 2015, USEPA and GHD met with owners and tenants and informally discussed the potential for further remedial work; additional discussions are pending.

¹ On November 5, 2015, USEPA adjusted the SS screening level attenuation factor from 50 to 33. A Building 15 (SIM Trainer) July 2015 TCE SS concentration was greater than the ODH SS screening level (AF of 33), but was less than the ODH SS screening level (AF of 50).

Projected Work for the Next Reporting Period

- The Respondents and USEPA On-Scene Coordinator will continue to work together to discuss VI mitigation measures and implement the mitigation work plan.
- Discussions regarding proposed SSDS modifications with building tenants/owners will be conducted following USEPA review of draft documents provided on October 30.
- The Respondents will review and respond to the USEPA response to the Good Faith Offer letter and comments on the new ASAOC and SOW.

Should you have any questions on the above, please do not hesitate to contact us.

Sincerely,

GHD



Julian Hayward

BR/cb/5

Encl.

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